

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
V.)	CASE NO: 2:06cr106-MEF
)	
LEEDRICT C. JONES)	

MOTION TO CONTINUE TRIAL

COMES NOW the Defendant, **LEEDRICT C. JONES**, by and through undersigned counsel, Donnie Bethel, pursuant to 18 U.S.C. 3161 §§ (h)(8)(A) and (h)(8)(B), and respectfully moves the Court for an Order continuing this matter to Chief District Judge Fuller's December Trial Term. In support of this motion, the Defendant would show the following:

1. This case is currently scheduled for trial on September 18, 2006.
2. At trial Mr. Jones intends to offer testimony from an expert witness on the subject of false confessions, as well as from an expert witness on the subject of eyewitness identification. The expert witness that Mr. Jones intends to call on the subject of false confessions is Professor Richard Ofshe, PhD, of the University of California at Berkeley. Prof. Ofshe is unavailable for trial in September, as he will be working as an expert witness in a court-martial on the island of Guam. Prof. Ofshe has confirmed his availability for the first two weeks of December.
3. Therefore, Mr. Jones contends that the ends of justice will be served by the Court continuing Mr. Jones' trial to the December Trial Term.

4. A *Waiver of Speedy Trial*, pursuant to Title 18 United States Code §3161, is being filed forthwith.

5. The United States, through Assistant United States Attorney Verne Speirs, has no opposition to a continuance.

WHEREFORE, Mr. Jones respectfully requests that this Motion to Continue be granted.

Respectfully submitted,

s/ Donnie W. Bethel
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CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Verne Speirs, Esq., Assistant U. S. Attorney, One Court Square, Suite 201, Montgomery, Alabama 36104.

Respectfully submitted,

s/ Donnie W. Bethel
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